



Closed Circuit Television (CCTV) Policy

Introduction

A Closed Circuit Television (CCTV) System is in place in Holbeach Primary School. This system, known as the 'CCTV System', comprises a number of cameras installed at strategic locations. All of the cameras are fully operational and recorded.

For the purpose of this policy, the 'Owner' of the system is Holbeach Primary School. For the purposes of the Data Protection Act, the 'Data Controller' is Holbeach Primary School.

This policy will be subject to review periodically, but at least biennially, to include consultation with interested parties.

Throughout this policy it is intended, as far as possible, to balance the objectives of the CCTV System with the need to safeguard the individual's rights. Every effort has been made throughout this policy to indicate that a formal structure has been put in to place, including a complaints procedure.

Objectives of this policy

The objectives of the CCTV System which form the lawful basis for the processing of data are:

- To protect Holbeach Primary School buildings and its assets.
- To protect the health and safety of College members and visitors.
- To increase personal safety and reduce the fear of crime.
- To detect, prevent and reduce incidence of property crime, public disorder and offences against people.
- To support the police in a bid to deter and detect crime, identify, apprehend and prosecute offenders.
- To protect members of the public and private property.

Principles

- The CCTV System is registered with the Information Commissioner under the terms of the Data Protection Act 2018.
- The CCTV System is operated in accordance with the Data Protection Act 2018 and the Information Commissioner's Code of Practice at all times.
- The CCTV System is operated in accordance with all the requirements and the principles of the Human Right Act 2018.
- The CCTV System is operated fairly, within the law, and only for the purposes for which it was established and is identified within this policy.
- The public interest in the operation of the system is recognised by ensuring the security and integrity of operational procedures.

Key Personnel and Responsibilities

- The Headteacher and Premises Manager are the overall managers of the CCTV System and responsible for ensuring the objectives and principles set out in this policy are upheld.
- The office team have day-to-day responsibility for the monitoring, operation and evaluation of the CCTV System and the implementation of this policy.
- The office team are responsible for maintaining full management information as to the incidents dealt with in the management of the CCTV System.

- The telephony provider (Focus Group) provide day-to-day IT support for the CCTV system.

Cameras and Area Coverage

- The areas covered by CCTV to which this policy refers are the buildings and grounds of Holbeach Primary School, including the school's nursery.
- Unless an immediate response to events is required, authorised CCTV operators are instructed not to direct cameras at an individual, their property or a specific group of individuals, without authorisation from the Headteacher or Premises Manager.
- None of the cameras forming part of the system are installed in a covert manner. Some cameras may be enclosed within 'All weather domes' for aesthetic or operational reasons.

Monitoring Equipment

A monitor is installed behind the front desk in the school office. The equipment has the capability of monitoring all cameras simultaneously throughout every 24-hour period.

The CCTV System records the images from all cameras in real time.

Access to the cameras, operating controls, recording and reviewing equipment is strictly limited to:

- Authorised and trained staff during working hours.
- The Headteacher and Deputy Headteacher.
- Members of the Focus Group team for IT support to the system.
- Any authorised person operating the cameras acts with utmost integrity at all times.

Any replay of pre-recorded data is only undertaken in the following area:

- Premises Manager's office
- Headteacher's office.

There must be a good reason for the viewing. A log of the playback is retained on file by the Headteacher, together with details of the purpose and those present at the viewing.

Access to pre-recorded data is strictly limited to:

- Headteacher and Premises Manager.
- The senior leadership team (in appropriate circumstances).
- The School Governors, or other officials, by way of a written request.

Unauthorised persons do not have access to any part of the CCTV System without the authorisation of the Headteacher and Deputy Headteacher.

All CCTV operators receive training relevant to their role. Further training is provided as necessary.

Privacy and Data Protection

All personal data obtained by virtue of the system, are processed fairly and lawfully and, in particular, are only be processed in the exercise of achieving the stated objectives of the CCTV System. In processing personal data, there is total respect for everyone's right to privacy.

The storage and security of the data will be strictly in accordance with the requirements of the Data Protection Act 2018, the Information Commissioner's Code of Practice and the School's Data Protection Policy.

All data is processed in accordance with the principles of the Data Protection Act, 2018, which, in summarised form, includes, but is not limited to:

- All personal data is obtained and processed fairly and lawfully.
- Personal data is held only for the purposes specified.
- Personal data is disclosed only to the people listed within this policy.
- Only personal data is held that is adequate, relevant and not excessive in relation to the purpose it is held.

- Steps will be taken to ensure personal data is accurate and where necessary, kept up to date.
- Personal data is held no longer than necessary.
- Individuals are allowed access to information held about them and, where appropriate, permitted to correct or erase it.
- Security measures are in place to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of information.

Operation of the System by the Police

Under certain circumstances the Police may make a request to assume direction of the CCTV System. Only written requests made under section 29 of the Data Protection Act 2018 will be considered. Any such request will only be accommodated on the authority of the Headteacher.

In the event of such a request being permitted, only those CCTV operators who are authorised to do so will operate the CCTV System under the direction of the police officer.

Maintenance of the CCTV System

Provision is made for regular/periodic service checks of the CCTV equipment, which includes cleaning of any all-weather domes or housings, checks on the functioning of the equipment, and any minor adjustments that need to be made to the equipment settings to maintain picture quality.

The company 'Focus Group' have full responsibility for all technical hardware aspects of the CCTV system. Should a fault develop all cameras, servers, switches and computers have maintenance and warranty agreements in place.

The office team will maintain appropriate records in respect of the functioning and maintenance of the cameras.

Handling of recorded material

For the purposes of this policy 'recorded material' means any material recorded by, or as the result of, technical equipment which forms part of the CCTV system, but specifically includes images recorded digitally, on hard drive and by way of DVD copying, including digital video prints.

Subject to the equipment functioning correctly, images from the cameras are recorded throughout every 24-hour period. Recorded footage is retained for a period of 30 Days.

Every digital recording obtained by using the CCTV System has the potential of containing recorded material, which may have to be admitted in evidence at some point during its life span. Irrespective of the format (e.g. DVD, paper copy, etc.), images obtained from the CCTV system are treated strictly in accordance with this policy from the moment they are received until their final destruction.

Access to, and the use of, recorded; material is strictly for the purposes defined in this policy.

Recorded material is not copied, sold, or used for commercial purposes or the provision of entertainment.

In complying with the National Standard for the Release of Data to Third Parties, it is intended, as far as reasonably practicable, to safeguard individual rights to privacy and to give effect to the following principles:

- Recorded material shall be processed lawfully and fairly, and used only for the purposes defined in this policy.
- Access to recorded material will only take place in accordance with the procedures outlined in this policy.
- The release or disclosure of data for commercial or entertainment purposes is specifically prohibited.

- Members of the police service or other agencies having a statutory authority to investigate and/or prosecute offences may release details of recorded information to the media only in an effort to identify alleged offenders or potential witnesses.

Under such circumstances, full details will be recorded.

It may be beneficial to make use of 'real' digital recordings for the training and education of those involved in the operation and management of CCTV systems, and for those involved in the investigation, prevention, and detection of crime. Any material recorded by virtue of the CCTV system is only used for such training and education purposes.

A video print is a copy of an image or images, which already exists on a hard drive or DVD. Video prints are not taken as a matter of routine. The Headteacher and Deputy Headteacher, must authorise any requests to make video prints from the CCTV System. There must be a good reason for the request. If a video print is made, the purpose of the request is recorded.

The record will include brief details of the nature of the incident together with the location, time and date.

If a video print is required in connection with a criminal investigation, it is treated as an exhibit and dealt with in accordance with the rules of evidence in respect of continuity, disclosure, etc.

Copyright

Copyright and ownership of all material recorded by virtue of the CCTV System remains with the Data Controller. Access to 'Personal Data'

The Data Protection Act 2018 provides Data Subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV.

Request for access should be made in writing to the Headteacher.

Public Information

A copy of this policy is made available on request.

Warning signs are in place at Holbeach Primary School by areas covered by the CCTV system.

The signs indicate the presence of CCTV monitoring.

Complaints

Any complaints about the College's CCTV System should be addressed to the Headteacher.

Breaches of this policy

Any breach of this policy is initially investigated by the Headteacher, in order for the appropriate action to be taken.

Date of Policy: October 2020

Date of Review: October 2023

Appendix A - CCTV locations

| # | Number | Location |
|----|--------|--|
| 1 | 1.39 | RECEPTION EY04 TOILET BLOCK WALL OUTSIDE |
| 2 | 1.40 | ROOF PLAYGROUND ABOVE RECEPTION SLASSES NELGARDE ROAD END |
| 3 | 1.41 | ROOF PLAYGROUND ABOVE DINING HALL NELGARDE ROAD END |
| 4 | 1.30 | OUTSIDE GIRLS TOILET WALL |
| 5 | 1.31 | INSIDE DINING HALL |
| 6 | 1.32 | KITCHEN DELIVERY ENTRANCE NELGARDE ROAD BLACK GATES |
| 7 | 1.34 | BOTTOM OF STEPS NEXT TO RECEPTION CLASS EY04 |
| 8 | 1.35 | OUTSIDE HANDWASHING SINKS NEXT TO GLASS CONNECTING CORRIDOR |
| 9 | 1.36 | OUTSIDE GIRLS TOILET WALL ABOVE SIDE FIRE EXIT |
| 10 | 1.37 | INSIDE GLASS CONNECTING CORRIDOR TO DINING HALL |
| 11 | 1.38 | DINING HALL VENTILATION PLANT ROOM NEXT TO GLASS CONNECTING CORRIDOR |
| 12 | 1.42 | ROOF PLAYGROUND ABOVE RECEPTION CLASSES DOGGETT ROAD END |
| 13 | 1.45 | BETWEEN OUTSIDE BOYS TOILETS UNDER DINING HALL |
| 14 | 1.46 | KITCHEN/HALL BOILER PLANT ROOM |
| 15 | 1.49 | KITCHEN SIDE ENTRANCE |
| 16 | 1.47 | NURSERY OUTSIDE PLAY AREA (HIGH LEVEL) |
| 17 | 1.48 | NURSERY NELGARDE ROAD ENTRANCE |
| 18 | 1.33 | RECEPTION CLASSES BOILER PLANT ROOM |
| 19 | 1.44 | RECEPTION OUTSIDE PLAY AREA (LOW LEVEL) |
| 20 | 1.43 | NURSERY OUTSIDE PLAY AREA (LOW LEVEL) |

Appendix B – Checklist

This CCTV system and the images produced by it are controlled by the Premises Manager who is responsible for how the system is used.

The School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the school's community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

| CCTV Review actions | Checked (Date appropriate) if | By | Date of next review |
|--|-------------------------------|-----------------------|---------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded. | 04/10/2020 | Derek Holmes (DH) | Oct-2021 |
| There is a named individual who is responsible for the operation of the system. | 04/10/2020 | Tom Bulpitt (TB) / DH | Oct-2021 |
| A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required. | 04/10/2020 | DH | Oct-2021 |
| Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate. | 04/10/2020 | DH | Oct-2021 |
| Cameras have been sited so that they provide clear images. | 04/10/2020 | DH | Oct-2021 |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises. | 04/10/2020 | DH | Oct-2021 |
| There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s). | 04/10/2020 | DH | Oct-2021 |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them. | 04/10/2020 | DH | Oct-2021 |
| The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. | 04/10/2020 | DH | Oct-2021 |
| Except for law enforcement bodies, images will not be provided to third parties. | 04/10/2020 | DH | Oct-2021 |
| The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made. | 04/10/2020 | DH | Oct-2021 |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images. | 04/10/2020 | Efinitinet | Oct-2021 |

Appendix C – CCTV Signage

It is a requirement of the GDPR to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for any enquiries

Example sign:

